

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
WESTERN DIVISION**

JANE DOE #1, on behalf of	)	
herself and all others similarly	)	
situated	)	
	)	
Plaintiffs,	)	CIVIL ACTION NO:
	)	7:21-cv-00220-LSC
	)	
v.	)	Honorable L. Scott Coogler
	)	
MG FREESITES, LTD, d/b/a	)	
“PORNHUB,” et al.,	)	
	)	
	)	
Defendants.	)	

**RESPONSE IN OPPOSITION TO DEFENDANT’S MOTION FOR**  
**SUMMARY JUDGMENT**  
**EXHIBIT LIST**

Ex. 110 - Deferred Prosecution Agreement

Ex. 111 - [REDACTED] 30(b)(6) Dep.

Ex. 112 - [REDACTED] Decl.

Ex. A. Report

Ex. B. Rebuttal Report

Ex. 113 - MindGeek\_NDAL\_00006964, [REDACTED]

Ex. 114 - MindGeek\_NDAL\_00381500, Email Re: [REDACTED]  
[REDACTED]

Ex. 115 - MindGeek\_NDAL\_00091742

Ex. 116 - MindGeek\_NDAL\_00051750 & MindGeek\_NDAL\_000097977

Ex. 117 - MindGeek\_NDAL\_00173889, Email re: [REDACTED]

Ex. 118 - MindGeek\_NDAL\_00035575, Email re: [REDACTED]  
[REDACTED]

Ex. 119 - MindGeek\_NDAL\_00473708, Email re: [REDACTED]  
[REDACTED]

Ex. 120 - [REDACTED] Decl.  
Ex. A. Report  
Ex. B. Rebuttal

Ex. 121 - Mindgeek\_NDAL\_00062242, 4.2.20 Email from [REDACTED] [REDACTED]

Ex. 122 - MindGeek\_NDAL\_00034580, Nov. 2019 Emails re [REDACTED]  
[REDACTED]

Ex. 123 - Standing Committee on Access to Information, Privacy, and Ethics,  
Evidence Number 019, February 5, 2021 at 11.

Ex. 124 - MindGeek\_NDAL\_00524042, Feb. 2021 Email [REDACTED]

Ex. 125 - MindGeek\_NDAL\_00120048, [REDACTED]

Ex. 126 - MindGeek\_NDAL\_00120497, [REDACTED]

Ex. 127 - [REDACTED] (July 14, 2023)

Ex. 128 - [REDACTED] (Jan. 11, 2024)

Ex. 129 - MindGeek\_NDAL\_00126761

Ex. 130 - MindGeek\_NDAL\_00575657, [REDACTED]

Ex. 131 - MindGeek\_NDAL\_00575652

Ex. 132 - MindGeek\_NDAL\_00005968

Ex. 133 - MindGeek\_NDAL\_00006969, [REDACTED]

Ex. 134 - MindGeek\_NDAL\_00381500

Ex. 135 - MindGeek\_NDAL\_00600977, [REDACTED]

Ex. 136 - MindGeek\_NDAL\_00181370, [REDACTED]

Ex. 137 - [REDACTED] Decl.

Ex. A. Report

Ex. B. Rebuttal

Ex. 138 - Feb. 2, 2024 Letter to Defs.' Counsel

Ex. 138 - Feb. 2, 2024 Letter to Defs.' Counsel

Ex. 139 - MindGeek\_NDAL\_00002193

Ex. 140 - MindGeek\_NDAL\_00120251

Ex. 141 - MindGeek\_NDAL\_00002162

Ex. 142 - MindGeek\_NDAL\_00605527 - [REDACTED]

[REDACTED]

Ex. 143 - MindGeek\_NDAL\_00578842, [REDACTED]

Ex. 144 - [REDACTED]. (June 1, 2023)

Ex. 145 - MG Content RT Limited, [REDACTED]

Ex. 146 - MindGeek\_NDAL\_00578850, [REDACTED]

[REDACTED]

Ex. 147 - MindGeek\_NDAL\_00503341, [REDACTED]

[REDACTED]

Ex. 148 - [REDACTED] Dep. (March 26, 2024)

Ex. 149 - MindGeek\_NDAL\_0064250, [REDACTED]

[REDACTED]

Ex. 150 - [REDACTED] Doc

Ex. 151 - MindGeek\_NDAL\_00562948

Ex. 152 - MindGeek\_NDAL\_00024423

Ex. 153 - MindGeek\_NDAL\_00292267

Ex. 154 - MindGeek\_NDAL\_00010499

Ex. 155 - MindGeek\_NDAL\_00023358

Ex. 156 - MindGeek\_NDAL\_00479021, [REDACTED]

Ex. 157 - MindGeek\_NDAL\_00479022, [REDACTED]

Ex. 158 - MindGeek\_NDAL\_00550048, [REDACTED]

Ex. 159 - MindGeek\_NDAL\_00550046, [REDACTED]

Ex. 160 - MindGeek\_NDAL\_00575656, [REDACTED]

Ex. 161 - MindGeek\_NDAL\_00110755

Ex. 162 - MindGeek\_NDAL\_00001386

Ex. 163 - MindGeek\_NDAL\_00063595

Ex. 164 - MindGeek\_NDAL\_00001933

Ex. 165 - MindGeek\_NDAL\_00020604, Email Re: [REDACTED]

[REDACTED]

Ex. 166 - MindGeek\_NDAL\_00174022, [REDACTED]

Ex. 167 - MindGeek\_NDAL\_00038960

Ex. 168 - [REDACTED] Deposition Transcript (CDCA June 14, 2023)

Ex. 169, MindGeek\_NDAL\_00123207

Ex. 170, Removed prior to filing and no longer exists

Ex. 171, [REDACTED]s\_00002186

Ex. 172, [REDACTED] Decl,

Ex. 173, MindGeek\_00616898

Ex. 174, MindGeek\_NDAL\_00155372

Ex. 175, MindGeek\_NDAL\_00031776

Ex. 176, [REDACTED] 30(b)(6) Dep. Transcript